

Before the  
**Federal Communications Commission**  
 Washington, D.C. 20554

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SEP 30 2004

In the Matter of )  
 )  
 Amendment of Section 73.202(b) )  
 Table of Allotments, )  
 FM Broadcast Stations. )  
 )  
 (Oak Harbor, Washington) )  
 )  
 )

Federal Communications Commission  
 Office of Secretary

MB Docket No. 04-305  
 RM-10980

To: Assistant Chief, Audio Division

**COMMENTS ON NOTICE OF PROPOSED RULEMAKING**  
**AND COUNTERPROPOSAL**

Bible Broadcasting Network, Inc. ("BBN"), by its attorneys, and pursuant to Section 1.420(d) of the Commission's Rules, respectfully files its comments and counterproposal on the *Notice of Proposed Rule Making*, DA 04-2461, released August 6, 2004 ("NPRM"), that proposed, *inter alia*, to allot FM Channel 289A to Oak Harbor, Washington, as its first local aural transmission service.<sup>1</sup> BBN supports the allotment of the channel to Oak Harbor, Washington, but requests that it be reserved for noncommercial educational ("NCE") use as Channel \*289A in the Commission's Table of Allotments.

The NPRM includes proposals for 10 communities, including Oak Harbor, and recites that each proposal warrants consideration because it complies with the Commission's technical requirements and would serve the public interest. Dana J. Puopolo proposed to allot Channel 289A to Oak Harbor as that community's first local service.<sup>2</sup> The NPRM states that Oak Harbor

<sup>1</sup> Comments and Counterproposals are due by September 30, 2004, so this counterproposal is timely filed.

<sup>2</sup> The allocation coordinates are: 48-17-36 NL and 122-38-31 WL.

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is an incorporated city located in Island County with a 2000 U.S. Census population of 19,795 persons. The NPRM also states that this allotment is at city reference coordinates and requires no site restriction. Oak Harbor is located within 320 kilometers (199 miles) of the U.S.-Canadian border. Canadian concurrence has been requested, as a specially negotiated short-spaced allotment, since the proposed Oak Harbor allotment is short-spaced to Canadian Station CBU-FM, Channel 289C, Vancouver, BC. In addition, a minor change application (File No. BPH-20031021ADK) was later filed by Jodesha Broadcasting, Inc., licensee of FM Station KJET, Channel 289C1, Raymond, Washington, which conflicts with the proposed Oak Harbor allotment. The NPRM announces that, as such, the application will be treated as a counterproposal in this proceeding.

The KJET application was filed as a result of a series of allotment changes in MM Docket No. 00-41 (*Oakville, Raymond, and South Bend, Washington*, 17 FCC Rcd 997 (Alloc. Br. 2002)). Channel 289C2 was allotted to Raymond, Washington, for use by KJET which had previously been licensed to serve South Bend, Washington. There is no new service being created by the KJET application, so the allotment of a first local service to Oak Harbor is preferred under *Revision of FM Priorities*, 90 FCC 2d 88 (1982). However, as a compromise, BBN offers the attached Spacing Study (Exhibit 1) demonstrating that KJET could coexist with the Oak Harbor allotment if it were to downgrade to Class C2.

Attached hereto as Exhibit 2, and incorporated herein by reference, is an Engineering Report prepared by BBN's consulting engineers. That Report demonstrates that Channel 289A may be reserved for NCE use at Oak Harbor in compliance with the Commission's criteria for such reservations set forth in *Reexamination of the Comparative Standards for Noncommercial*

*Educational Applicants*, 15 FCC Rcd 7386 (2000) ("*NCE Report and Order*"). The Commission established revised criteria by which a rulemaking proponent may reserve an FM allotment for NCE use. Under this criteria, a proponent must demonstrate that it is technically precluded from using a reserved channel (Channels 201 through 220) and the proposal would provide a first and/or second NCE radio service to at least 10 percent of the population within the 1 mV/m contour of the proposed station.

The Engineering Report makes this showing and provides the basis on which the showing was made. Since the channel may be reserved for NCE use and since it is preferred to the KJET application, the channel should be allotted to Oak Harbor.

Should the Commission allot Channel 289A to Oak Harbor, Washington, as an NCE allotment, BBN will file an application during the applicable window period and, if BBN receives a construction permit, BBN will promptly construct and operate a station on Channel 289A at Oak Harbor.

In light of the foregoing, BBN respectfully requests the Commission to reserve Channel \*289A at Oak Harbor, Washington, for NCE use.

Respectfully submitted,

BIBLE BROADCASTING NETWORK, INC.



By: \_\_\_\_\_

Gary S. Smithwick  
Its Attorney

SMITHWICK & BELENDIUK, P.C.  
5028 Wisconsin Avenue, NW  
Suite 301  
Washington, DC 20016

202-363-4560

September 30, 2004

# **EXHIBIT 1**

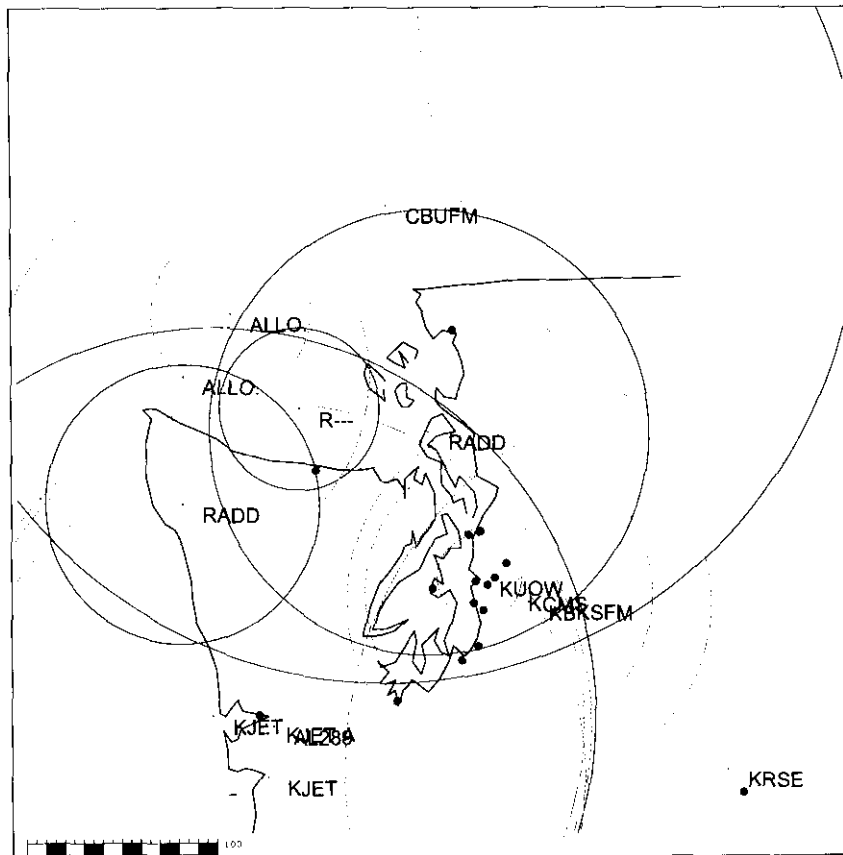
Oak Harbor, WA  
Spacing Study with KJET Application as a Class C2

FMCONT<sup>(TM)</sup> LOCATE STUDY

Ch 289 A  
105.7 MHz

N. Lat. 48 17 43  
W. Lng. 122 39 31

Dates:  
Data:09-25-04  
Job :09-29-04



Call	CH#	Type	Location		D-KM	Azi	FCC	Margin
CBUFM	289C	OPE-D	Vancouver	BC	119.63	349.7	247.0	-127.37
RADD	289A	ADD	Oak Harbor	WA	0.00	0.0	115.0	-115.00
KJET	289C1	RSV	Raymond	WA	184.53	217.9	200.0	-15.47
AL289	289C2	RSV	Raymond	WA	171.84	208.4	166.0	5.84
KJET.A	289C2	APP N	Raymond	WA	172.69	209.7	166.0	6.69
KBKSFM	291C	LIC	Tacoma	WA	101.95	149.4	95.0	6.95
KCMS	287C1	LIC	Edmonds	WA	93.10	153.6	75.0	18.10
R---	286A	ADD	Metchosin Etc.	BC	68.74	280.4	42.0	26.74
KJET	289C2	LIC-Z	South Bend	WA	196.63	205.6	166.0	30.63
KRSE	289C1	LIC	Yakima	WA	233.55	138.3	200.0	33.55
ALLO.	290A		Port Renfrew	BC	132.06	282.9	98.0	34.06
KUOW	235C1	LIC	Seattle	WA	79.93	160.8	22.0	57.93
RADD	288A	ADD	Forks	WA	134.27	254.2	72.0	62.27
ALLO.	286A		Lake Cowichan	BC	120.61	300.9	42.0	78.61

## **EXHIBIT 2**

# **ENGINEERING REPORT**

## **Statement of NCE Channel Reservation Preclusion**

Concerning

**RADD Channel CH289A – Oak Harbor, WA**

**September, 2004**

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**MUNN-REESE, INC.**

Broadcast Engineering Consultants  
Coldwater, MI 49036

# DISCUSSION

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The firm of Munn-Reese, Inc., was retained to prepare this report analyzing the potential for the reservation of RADD Channel CH289A, Oak Harbor, WA for Non-commercial use. The methodology followed in this determination has been taken from the Second Report and Order, MM Docket No. 95-31, concerning the Reexamination of Comparative Standards for Noncommercial Educational Applicants. Based on Paragraphs 34 through 46 of the Second Report and Order, the Oak Harbor, WA CH289A Rulemaking may be reserved for NCE use based on the qualifications of the Second Report and Order.

Portions of Paragraph 34 read: *...First, it must establish the relative need for a new NCE service by demonstrating that maximum class facilities at the proposed allotment site would provide a first or second NCE service to at least ten percent of the population within the proposed station's service area and that such population is at least 2000 persons. The Commission will not reserve a particular allotment if this "first or second service" criterion is not satisfied at the allotment site's reference coordinates.* Included as **Exhibit 1.1** is a map depicting the RADD 289A service area in relation to the present Non-commercial facilities for the area. A total of 83,064 people will receive a first or second NCE service. This is both more than 2,000 minimum required and more than 10% of the RADD 289A 60 dBu service area population. (76.12% of the 109,126 population within the total RADD 289A 60 dBu service area will receive a "first" or "second" NCE service.) A tabulation of stations employed has been included as **Exhibit 1.2**. To ensure a worst case scenario, pending NCE applications or granted Construction Permits which will result in less 1<sup>st</sup> and 2<sup>nd</sup> NCE service have been employed. While it is believed use of these facilities may be disregarded, inclusion insures more than adequate coverage of greater than 10% and 2,000 persons.

Portions of Paragraph 35 read: *Secondly, a reservation request must include a technical preclusion showing. The following test is designed to provide a reliable and efficient proxy of technical preclusion. It is not a conclusive test, but one that the Commission will treat as establishing a rebuttable presumption of technical preclusion. The showing will be based on a circle, centered in the proposed community of license and drawn with a radius one kilometer less than the distance to the predicted 60 dBu strength signal of a maximum same-class facility. The reservation showing must establish that no rule-compliant facility can be authorized at maximum antenna height above average terrain ("HAAT") and with maximum effective radiated power ("ERP") on any reserved band channel at four equally-spaced locations on the circle, beginning with 0 (zero) degrees. In addition, the reservation showing must establish that no same-class rule-compliant facility can be authorized at minimum antenna HAAT and with minimum ERP on any reserved band channel at the city center coordinates for the community of license. Included are **Exhibit(s) 2.1 to 2.4** depicting NCE channel preclusion studies from the four equally spaced locations as described. Placement of the four points on bearings 0.0°T, 90.0°T, 180.0°T and 270.0°T at a distance of 27.3 km (1.0 km less than the full Class A 60 dBu reference distance of 28.3 km) results in the north, south and west points being located over water. Confusion was encountered as whether to modify these distances to actual land locations or proceed as is. However upon reviewing the FCC's own wording of the study. "...The following test is designed to provide a reliable and efficient proxy of technical preclusion. It is not a conclusive test, but one that the Commission will treat as establishing a rebuttable presumption of technical preclusion..." A good faith interpretation to proceed with actual FCC specified distances and bearings resulting in water bourn sites was assumed. As seen in the provided exhibits, no new full Class A facility may be allocated from any of the four locations without giving or receiving interference to any existing facility or pending application over at least some portion of land.*



## **DISCUSSION** (continued)

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In accordance with FCC guidelines, **Exhibit 3.1** also depicts a NCE channel preclusion study from the city reference coordinates of Oak Harbor, WA. While Minimum Class A antenna parameters may be no less than 100 watts ERP at 30 meters HAAT equivalent, this preclusion study has employed parameters of 1 watt at 1 meter HAAT to further demonstrate no reserved band Channel exists in which any full service FM facility could operate. As seen in the preclusion study, no new full or minimum Class A facility can be allocated without receiving or giving interference to any existing facility or pending application from any location within the Oak Harbor, WA area. In fact on all NCE reserved band Channels, the entire city limits of Oak Harbor is precluded by at least one facility on all NCE Channels. As no portion of Oak Harbor may be served, this city is categorically precluded from an NCE facility located in the reserved portion of the band.

Therefore, as no NCE reserved band Channel exists, it can be concluded the RADD 289A Allotment for Oak Harbor, WA meets all criteria for NCE Channel reservation.

### **CERTIFICATION OF ENGINEERS**

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The firm of Munn-Reese, Inc., Broadcast Engineering Consultants, with offices at 385 Airport Drive, Coldwater, Michigan, has been retained for the purpose of preparing the technical data forming this report. I declare under penalty of perjury that the contents of this report are true and accurate to the best of my knowledge and belief.

September, 22, 2004

385 Airport Drive, PO Box 220  
Coldwater, Michigan 49036  
Telephone: 517-278-7339

**MUNN-REESE, INC.**

By Wayne S. Reese  
Wayne S. Reese, President

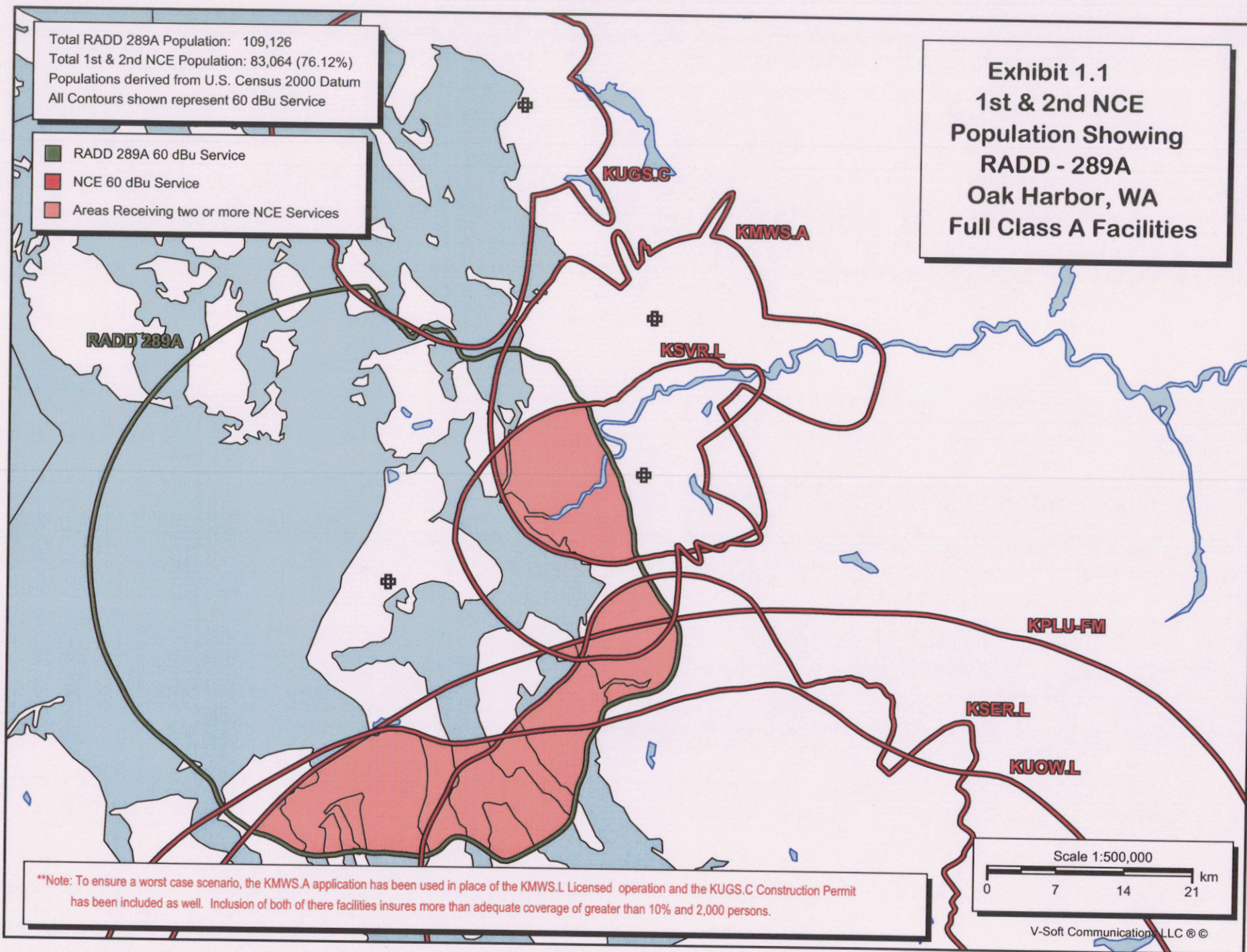
By Justin W. Asher  
Justin W. Asher, Project Engineer



Total RADD 289A Population: 109,126  
Total 1st & 2nd NCE Population: 83,064 (76.12%)  
Populations derived from U.S. Census 2000 Datum  
All Contours shown represent 60 dBu Service

- RADD 289A 60 dBu Service
- NCE 60 dBu Service
- Areas Receiving two or more NCE Services

**Exhibit 1.1**  
**1st & 2nd NCE**  
**Population Showing**  
**RADD - 289A**  
**Oak Harbor, WA**  
**Full Class A Facilities**





Duopoly Study

Center = 48 17 43 N, 122 39 31 W

09-22-2004

	Call	Coordinates	Dist	Bear	Chan	Pwr(kW)	City	State	File #
1	>*RADD	481743N 1223931			289A	6.00	User Reference		
2	KMWS.A*	483230N 1221743W	38.4	44	209A	1.5	Mount Vernon	WA	BPED20020408ABO
3	KMWS.L	482613N 1221836W	30.3	58	211A	0.1	Mount Vernon	WA	BLED19920702KA
4	KPLUFM.L	473014N 1215829W	101.8	149	203C	58	Tacoma	WA	BLED19890925KA
5	KSER.L	480128N 1220641W	50.6	126	214A	5.8	Everett	WA	BLED19990415KA
6	KSVR.L	482349N 1221826W	28.4	66	219A	0.17	Mount Vernon	WA	BLED20021112AAQ
7	KUGS.C*	484411N 1222847W	50.8	15	207A	0.7	Bellingham	WA	BPED19990318ME
8	KUOW.L	473658N 1221828W	79.9	160	235C1	100	Seattle	WA	BLED19850715KJ

Number in list= 8

## CONCLUSIONS

[illegible]

[illegible]



CH CITY	CALL	TYPE STATE	AZI FILE #	DIST FILE #	PRO(km) LICENSEE	*IN* *OUT*	Page # 7
CH CITY	CALL	TYPE STATE	AZI FILE #	DIST FILE #	PRO(km) LICENSEE	*IN* *OUT*	Page # 8
217C ALLO Saturna Island	DEL	BC	304.3 124.3	46.86	97.0	-111.05<	-81.82<
217C R--- Saturna Island	ADD	BC	304.3 124.3	46.86	97.0	-88.06<	-76.92<
217C NEW Victoria	PRO DCN	BC	275.7 95.7	66.82	62.5	-46.06<	-42.45<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	97.0	-38.06<	-76.92<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	97.0	-7.84<	-30.52<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	97.0	-73.08<	-34.94<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	97.0	-29.05	-33.14<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	68.7	-34.95	-4.88<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	33.0	-30.44	-11.53<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	33.0	-38.53<	-11.53<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	33.0	-0.67<	-10.17<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	11.7	-1.78<	14.68
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	17.7	13.0R	38.0M
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	65.0	13.0R	43.3M
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	28.5		
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	97.0	-173.04<	-133.23<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	97.0	-173.04<	-133.23<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	62.5	-95.92<	-88.18<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	97.0	-159.74<	-122.65<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	97.0	-159.74<	-122.65<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	33.0	-90.05<	-64.50<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	30.2	-0.81<	3.88
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	100	11.7	-1.78<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	0.3	Board of Trustees of Seag	
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	12.4	17.7	12.0R
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	65.0	12.0R	43.3M
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	28.5		
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	97.0	-33.55<	-92.76<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	97.0	-28.43<	-88.01<
217C R--- Victoria	DEL	BC	275.7 95.7	66.82	33.4	-12.82<	-7.15<
217C R--- Victoria	ADD	BC	275.7 95.7	66.82	56.2		

CH CITY	CALL	TYPE	ATL C-#	DIST PILE #	LAT. LAG	Per (km)		PROJ (km)	*IN* LICENSEE (Overlap in km)	*OUT* LICENSEE (Overlap in km)	Page # 9
						HAZ (M)	INT (km)				
217C	ALLO	BC	304.3	45.86	48 46 28 123 10 10	100.000	655	97.0	13.66<	-52.30*<	
	Saturna Island		124.3				14.3				
217C	R---	DEL	304.3	45.86	48 46 28 123 10 10	100.000	655	97.0	13.66<	-52.30*<	
	Saturna Island		124.3				14.3				
219A	ASVR	LIC DCX	122.5	29.36	48 23 49 122 18 36	0.019	308	11.7	-18.43*<	-29.69<	
	Mount Vernon		702.5	3122002112NAQ			291	17.0			
219A	KZAZ	LIC DCN	24.4	32.06	48 48 04 122 27 40	0.114	189	14.4	-20.64<	-29.79<	
	Bellingham		204.4	BLSD19910828XA			21.8	Washington State University			
217C	R---	DEL	275.7	66.82	48 35 41 123 32 37	100.000	655	97.0	25.87	-33.14*<	
	Victoria		95.7				14.0				
217C	R---	ADD	275.7	66.82	48 35 41 123 32 37	100.000	655	97.0	25.87	-33.14*<	
	Victoria		95.7				14.0				
222CI	ALLO	BC	345.9	93.41	49 21 12 122 57 18	100.000	0	86.0	59.36	-6.58	
	Vancouver		165.9			-63	3.2				
---- Channel-61x TV station of concern ----											
0622	CHEKTV	L2 HN	304.3	46.87	48 46 28 123 10 10	100.000	0	59.0	To Grd B*	-12.16	
	Victoria		124.3			-6		CHEK TV Ltd			





CH	CALL	TYPE	AZI	DIST	LAT.	Per (M) COM (M)	PRO (km)	*IN*	Page # 3
CITY	STATE	FILE #	<-	>	LNG.	HAAT (M)	INT (km)	LICENSE	(Overlap in km)
207A	KUGS	LIC CN	342.9	51.64	48 44 11	0.100	213	5.6	10.88<
207A	Bellevue	152.2	WLED1980013KA	122 28 47	-41	8.0	Western Washington Univ	97.0	31.10
208A	ALLO	BC	309.4	85.15	48 46 28	100.000	615	97.0	31.10
208A	Saturne Island	129.4			123 10 10	602	13.7		
211A	KMS	LIC HN	350.3	16.27	48 26 13	0.100	52	5.6	8.98<
211A	Mount Vernon	WA	170.3	BLED19920702KA	122 18 36	-110	0.7	Washington State Univers	8.20
209B	CUSUPM	OPR DFN	300.6	126.30	48 51 38	3.470	741	73.5	0.39<
209B	Duncan	BC	120.6		123 45 20	661	87.5		-21.42<
209B	ALLO	BC	300.6	126.30	48 51 38	50.000	741	55.0	-40.40<
209B	Duncan	120.6 RM			123 45 20	661	128.3		-12.90<
210A	AP210	APP VN	152.2	27.07	48 04 39	0.200	176	13.8	-7.36<
210A	Marysville	WA	332.2	BNED20000331AAK	122 06 10	130	1.0	Pennacola Christian Coll	10.06
209B	KMS	LIC DCX	171.5	84.28	48 22 30	1.500	201	24.2	-61.08<
209B	Mount Vernon	WA	176.6	BLED20020408ABO	122 17 43	143	73.1	Skagit Valley College	-61.81<
209B	ALLO	BC	300.6	126.30	48 51 38	50.000	741	65.0	-97.81<
209B	Duncan	120.6 RM			123 45 20	661	185.7		-65.69<
209B	CUSUPM	OPR DFN	300.6	126.30	48 51 38	3.470	741	73.5	-49.41<
209B	Duncan	BC	120.6		123 45 20	661	137.3		-74.20<
208C1	KHNC	LIC DCX	171.5	84.28	47 32 35	8.500	498	56.5	-32.69<
208C1	Seattle	WA	351.5	BLED20020402AAC	122 06 25	432	84.3	Seattle Public Schools	-21.77<
210A	AP210	APP VN	152.2	27.07	48 04 39	0.200	176	13.8	-7.36<
210A	Marysville	WA	332.2	BNED20000331AAK	122 06 10	130	20.9	Pennacola Christian Coll	-37.29<
211A	KMS	LIC HN	350.3	16.27	48 26 13	0.100	52	5.6	8.98<
211A	Mount Vernon	WA	170.3	BLED19920702KA	122 18 36	-110	8.0	Washington State Univers	-39.11<
209A	KMS-A	APP DCX	356.6	27.73	48 32 30	1.500	201	24.2	-24.40<
209A	Mount Vernon	WA	176.6	BLED20020408ABO	122 17 43	143	36.4	Skagit Valley College	-19.97<
209B	CUSUPM	OPR DFN	300.6	126.30	48 51 38	1.470	741	73.5	0.39<
209B	Duncan	BC	120.6		123 45 20	661	87.5		-21.42<
209B	ALLO	BC	300.6	126.30	48 51 38	50.000	741	65.0	-40.40<
209B	Duncan	120.6 RM			123 45 20	661	128.3		-12.90<
213C	R---	AOD	290.2	99.82	48 35 41	100.000	373	97.0	50.14
213C	Victoria	BC	110.2		122 32 37	341	10.8		-1.41
264C	KBRZ	LIC DEN	165.7	90.50	47 30 14	55.397	940	92.5	29.08
264C	Seattle	WA	345.7	BMLH20000211AAU	121 58 29	791	114.0	Entercom Seattle license.	61.5M
211A	KMS	LIC HN	350.3	16.27	48 26 13	0.100	52	5.6	-26.85<
211A	Mount Vernon	WA	170.3	BLED19920702KA	122 18 36	-110	18.6	Washington State Univers	-39.11<
211A	ALLO	BC	18.8	96.13	49 06 36	6.000	741	33.0	8.22<
211A	Chilliwack	BC	198.8		121 50 47	-204	48.3		
210A	AP210	APP VN	152.2	27.07	48 04 39	0.200	176	13.8	-27.23<
210A	Marysville	WA	332.2	BNED20000331AAK	122 06 10	130	20.9	Pennacola Christian Coll	-37.29<
211A	ALLO	BC	336.9	119.53	49 16 47	6.000	373	33.0	-32.90<
211A	ALLO	BC	345.4		122 55 04	137	116.5		-36.98<

FM	CALL	TYPE	STATE	AZ	DIST	FILE #	LAT.	LONG.	Par (M)	COR (M)	PRO (km)	*IN*	Page # 4
CITY									FOAT (M)	INT (m)	LICENSEE	(Overlap in km)	*OUT*
2111A	NEW	PRO HN	BC	336.9	110.53		49 16 47	122 55 04	0.450	373	37.8	4.62<	-41.73<
Burnaby				156.9					337	79.0			
2120C3	KEXPFM	CP DCX	WA	182.0	75.28		47 36 58	122 18 28	3.300	247	32.3	-4.66<	-5.45<
Seattle				2.0	BPEZ0011016AAR		122 18 28	181	48.5	University of Washington B			
Accepted on Channel 12181 by Canada by letter dated June 17, 2002 as a specially negotiated, short-spaced allocation. No limitations imposed.													
213C R---		ADD	BC	290.2	99.82		48 35 41	122 32 37	100.000	373	97.0	50.14<	-11.56
Victoria				110.2			123 32 37	341	10.8				
213A KXPW	PORT Angeles	LIC CN	WA	261.8	104.96		48 09 03		1.600	362	36.1	-32.50<	-33.64<
Everett				81.8	BLED1998042AKD		123 40 09	362	98.8	Washington State University			
214A KSER	Everett	LIC CN	WA	158.1	12.16		48 01 28		5.800	184	31.6	-5.13<	-4.69<
Application amended 2/9/1998													
264C X0BZ	Seattle	LIC DEN	WA	165.7	90.50		47 30 14		55.397	940	92.6	29.0R	61.5M
Accepted on Channel 12181 by Canada by letter dated June 17, 2002 as a specially negotiated, short-spaced allocation. No limitations imposed.													
--- Channel 212 90.3 Mhz ---													
213C R---	Victoria	ADD	BC	290.2	99.82		48 35 41		100.000	373	97.0	-49.29<	-60.22<
Victoria				110.2			123 32 37	341	110.2				
213C CHCVFM	Victoria	OPR DEN	BC	290.2	99.82		48 35 41		6.300	655	68.6	-32.98<	-31.78<
2120C3 KEXPFM	Seattle	CP DCX	WA	182.0	75.28		47 36 58		3.300	247	32.3	-45.81<	-48.27<
Seattle				2.0	BPEZ0011016AAR		122 18 28	181	88.4	University of Washington B			
Accepted on Channel 12181 by Canada by letter dated June 17, 2002 as a specially negotiated, short-spaced allocation. No limitations imposed.													
211A KXWS	Mount Vernon	LIC HN	WA	350.3	16.27		48 26 13		0.100	52	5.6	-16.26<	-26.91<
212A KXPMPM	Seattle	LIC C	WA	182.0	75.28		47 36 58		0.720	201	19.8	-18.26<	-35.78<
210A AP210	Marysville	APP VN	WA	152.2	27.07		48 04 39		0.200	176	13.8	-7.36<	10.06
214A KSER	Seattle	LIC CN	WA	158.1	32.16		48 01 28		5.800	184	33.6	-5.13<	-4.69<
Application amended 2/9/1998													
266A RAUD	Coupeville	ADD	WA	271.6	31.71		48 18 00		6.000	960	72.3	10.0R	21.7M
Accepted on Channel 12181 by Canada by letter dated June 17, 2002 as a specially negotiated, short-spaced allocation. No limitations imposed.													
--- Channel 213 90.5 Mhz ---													
213C R---	Victoria	ADD	BC	290.2	99.82		48 35 41		100.000	373	97.0	-116.08<	-105.66<
Victoria				110.2			123 32 37	341	177.0				
213C CHCVFM	Victoria	OPR DEN	BC	290.2	99.82		48 35 41		6.300	655	68.6	-84.58<	-77.22<
214A KSER	Everett	LIC CN	WA	158.1	32.16		48 01 28		5.800	184	33.6	-52.51<	-52.76<
Application amended 2/9/1998													
211A KXWS	Mount Vernon	LIC HN	WA	350.3	16.27		48 26 13		0.100	52	5.6	-8.98<	8.20
2120C3 KEXPFM	Seattle	CP DCX	WA	182.0	75.28		47 36 58		3.300	247	32.3	-4.86<	-5.45<
Seattle				2.0	BPEZ0011016AAR		122 18 28	181	48.5	University of Washington B			
Accepted on Channel 12181 by Canada by letter dated June 17, 2002 as a specially negotiated, short-spaced allocation. No limitations imposed.													

[illegible]



## CHANNEL PRECLUSION STUDY

Class= A , Pwr= 6 kW, HAAT= 100 M, GFD= 215 M									
REFERENCE									
Avg. F(50-10) 40 dBu= 86.7 54 dBu= 80.0 dBu= 9.1 100 dBu= 2.8									
SEARCH 09-21-04									
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SEARCH 03-08-05									
SEARCH 03-09-05									
SEARCH 03-10-05									

CH	CALL	TYPE	STATE	AZI	DIST	LAT.	LONG.	PER(KM)	COR(M)	PRO(KM)	*IN*	*OUT*	Page # 3
CITY	CITY	CITY	STATE	AZI	DIST	LAT.	LONG.	HAAT(M)	INT(KM)	LICENSE	LICENSE	(Overlap in km)	(Overlap in km)
207A	KQOS	LIC	CA	190.3	116.54	47 00 58	122 54 57	135	1.250	149	22.7	7.91	-7.68
207B	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207C	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207D	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207E	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207F	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207G	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207H	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207I	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207J	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207K	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207L	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207M	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207N	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207O	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207P	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207Q	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207R	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207S	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207T	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207U	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207V	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207W	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207X	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207Y	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
207Z	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208A	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208B	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208C	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208D	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208E	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208F	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208G	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208H	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208I	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208J	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208K	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208L	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208M	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208N	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208O	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208P	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208Q	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208R	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208S	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208T	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208U	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208V	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208W	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208X	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208Y	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
208Z	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209A	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209B	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209C	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209D	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209E	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209F	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209G	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209H	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209I	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209J	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209K	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209L	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209M	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209N	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209O	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209P	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209Q	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209R	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209S	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209T	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209U	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209V	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209W	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209X	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209Y	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
209Z	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210A	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210B	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210C	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210D	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210E	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210F	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210G	KQOS	WA	10.3	BLE20011228AAV	10.3	BLE20011228AAV	122 54 57	135	1.250	149	22.7	7.91	-7.68
210H	KQOS	WA	10.3	BLE20011228AA									

[illegible]

											Page # 7													Page # 8	
CH	CALL	TYPE	STATE	AZI	DIST	LAT	PRG (KM)	COR (M)	PRO (km)	*IN* *OUT*	Page # 7	CH	CALL	TYPE	STATE	AZI	DIST	LAT	PRG (KM)	COR (M)	PRO (km)	*IN* *OUT*	Page # 8		
CITY				<--	FILE #	LNG.	HAAT (M)	INT (km)	LICMSESE	Overlap in km		CITY				<--	FILE #	LNG.	HAAT (M)	INT (km)	LICMSESE	Overlap in km			
OPE HN	313.4	67.85	---	---	---	---	2.290	0	17.7	12.0R	55.8M	219A	KSVR	LIC DCX	WA	32.4	46.11	48 23 49	0.170	308	20.6	-55.59<	-74.27<		
BC	133.4						123 18 35	12.4				Mount Vernon						122 18 26	301	63.5	Board Of Trustees Of Shagi				
Channel 217 91.3 MHz. ---												219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
DEL	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 10 10	655	201.3			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 10 10	655	201.3			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 10 10	655	201.3			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 10 10	655	201.3			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Victoria							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C KBCS	334.5	89.73					48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
BC	154.5						123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
Saturna Island							123 32 37	567	195.5			219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784	226	32.8	-44.85<	-50.35<		
217C R---							48 46 28	100,000	655	97.0	-151.57<	219C3	KXOT	LIC DCN	WA	167.3	84.72	47 18 15	2.784						

--- Channel 219	91.7 MHz.	---			
219C2 XNOT-C	CP DCX	167.3	84.76	47 16 14	9.972
				172 23 42	202
					225
					43.1
					-64.50c
					-60.67c





[illegible]

[illegible]

										Page # 7			
CH	CALL	TYPE	STATE	AZL	DIST	PR (kW)	COR (M)	PRO (km)	*IN* *OUT*				
CITY	LANG.			FILE #	FILE #	HAAT (M)	INT (M)	LICENSEE	(Overlap in km)	LAT.	LNG.	PRO (km)	LICENSEE
217A R---		ADD		3.5	109.95	49 16 47	6 000	655	33.0	-23.25+	0.30+		
Burnaby		BC		183.5		122 55 04	624	93.2					
--- Channel 219 91.7 MHz. ---													
221C ALLO		BC		297.8	29.73	48 25 00	100 000	0	3.2	-13.30+	-82.43+		
Victoria				117.6		123 22 00							
221C R---		ADD		304.9	41.58	48 30 20	100 000	0	3.2	-1.53+	-70.58+		
Victoria		BC		124.9		123 28 23	-43						
219A KSVR		LIC DCX		77.2	53.45	48 23 49	0 144	308	19.5	-47.40+	-68.56+		
Mount Vernon		WA		257.2	BLED0021112AAQ	122 18 26	294	60.9	Board of Trustees of Skagi				
217C R---		DEL		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C R---		ADD		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C NEW		PRO DCN		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C R---		DEL		347.8	54.81	48 46 28	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		167.8		123 10 10	653						
219A KSVR		LIC DCX		77.2	53.45	48 23 49	0 144	308	19.5	-47.40+	-68.56+		
Mount Vernon		WA		257.2	BLED0021112AAQ	122 18 26	294	60.9	Board of Trustees of Skagi				
217C R---		DEL		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C R---		ADD		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C NEW		PRO DCN		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C R---		DEL		347.8	54.81	48 46 28	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		167.8		123 10 10	653						
219A KSVR		LIC DCX		77.2	53.45	48 23 49	0 144	308	19.5	-47.40+	-68.56+		
Mount Vernon		WA		257.2	BLED0021112AAQ	122 18 26	294	60.9	Board of Trustees of Skagi				
217C R---		DEL		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C R---		ADD		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C NEW		PRO DCN		310.7	51.75	48 35 41	100 000	655	97.0	-1.57+	-60.41+		
Victoria		BC		130.7		123 32 37	573						
217C R---		DEL		347.8	54.81	48 46 28	100 000	655	97.0	-1.57+	-60.41+		

CH	CALL	TYPE	AZI.	DIST	LAT.	PRO (km)	*IN *
CITY	STATE	<.. FILE #			LONG.	HAM (M)	LICENSEE
						COR (M)	INT (km)
							PRO (km)
							*IN *
							LICENSEE
							PRO (km)
							*IN *
							LICENSEE
							PRO (km)
							*IN *
							LICENSEE
							PRO (km)
							*IN *
							LICENSEE
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							LICENSEE
							PRO (km)
							*IN *
							LICENSEE

----- Channel)-six TV station of concern -----

0622	CHEKTV	LI	HN	347.8	54.82	48 45 28	100.000	0	59.0	TO GFD B*	14.12
						123 10 10	-2			Chek Tv Ltd	

## Page # 2

REFERENCES  
CLASS= A , PWR= 0.001 kW, HAAT= 1 M, COR= 26 M  
Average Protected F(50-50)= 1.82 km  
7 18 17 36 N  
SEARCH 09-22-04

DATE	TIME	TYPE	APZ	DIST	LAT	PER (KM)	COR (M)	PRO (KM)	*IN*	*OUT*
123	38	31	W							
Ave. $f(50-10)$ 40 dBu = 5.6 59 dBu = 2.3 90 dBu = 0.0										

CH CALL 4 LIFE 3001 HAAT (M) INT (KM) LICENSEE (OVERLAP AT KM)  
STATE 4 FILE # LNC.  
CITY

Channel 201	68.1 MHz	---	22.0	57.46	48.45	100.000	609	97.0	-135.46	-39.46
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[illegible]

--- Channel 202 88.3 MHz. ---

	201C	ALLO			
	32.9	63.86	48	46	28
	212.9		123	10	10
				596	136.4
					609
					97.0
					-74.334
					-35.974

205C1 ALLO	12.2	34.29	48 35 41	100.000	615	86.0	22.19	-51.85%
			131 12 37	310	10.3			

	BC	Victoria
DON	192.7	180.3
NON	12.2	34.29
	48.35	615
	28.35	58.7
	-24.53*	

	BC	Victoria
2008-09	123 32 37	100 000 615
2009-10	192.2	97.0
2010-11	4.1	48.32
2011-12	-33.23%	-33.23%

205C ALLO	32.9	63.86	48 46 20	100.00	0.00
Setuna Island	212.9		123 10 10	602	13.7
BC					

Channel 303 88.5 MHz.

	LIC DCY	124.6	152.47	47 30 14	33.793	940	89.0	-36.954	57.80
203C KPLUPM	204.6	0.001089025KA	121.68 29	844	187.6	Pacific Lutheran Universit			

[illegible]

State	BC	123	32	37	310	AVG
Victoria	192.2					
BC						
123						
32						
37						
310						
AVG						

Location	205C1 NEW	PRO DCN	BC	123	32	37	310	4.1	-34.024
Victoria		12.2	192.2						

205C ALLO	32.9	63.86	48 46 28	100.000	615	13.7
Saturna Island	212.9		123 10 10	602		
BC						

201C	ALLO	EC	201C	ALLO	EC
32.9	63.86	48	46	38	100.000
212.9		123	10	10	596
					13.7
					97.0
					48.39%
					-34.02%

\*\*\*\*\*  
BT  
#BXBTZ PLJTBG

	-27.92*	
--- Channel 20A	88.7 MHz.	---
	BBO DOWN	61.5
	12 2	34.29
	48 35 41	5.900
	58.7	-35.73*

Country	Year	Value	Unit
205C1 NEM	1982	123 32 37	68.2
205C1 NEM	1983	192.2	68.2
205C1 NEM	1984	100 000	615
205C1 NEM	1985	100 000	615
205C1 NEM	1986	100 000	615
205C1 NEM	1987	100 000	615
205C1 NEM	1988	100 000	615
205C1 NEM	1989	100 000	615
205C1 NEM	1990	100 000	615
205C1 NEM	1991	100 000	615
205C1 NEM	1992	100 000	615
205C1 NEM	1993	100 000	615
205C1 NEM	1994	100 000	615
205C1 NEM	1995	100 000	615
205C1 NEM	1996	100 000	615
205C1 NEM	1997	100 000	615
205C1 NEM	1998	100 000	615
205C1 NEM	1999	100 000	615
205C1 NEM	2000	100 000	615
205C1 NEM	2001	100 000	615
205C1 NEM	2002	100 000	615
205C1 NEM	2003	100 000	615
205C1 NEM	2004	100 000	615
205C1 NEM	2005	100 000	615
205C1 NEM	2006	100 000	615
205C1 NEM	2007	100 000	615
205C1 NEM	2008	100 000	615
205C1 NEM	2009	100 000	615
205C1 NEM	2010	100 000	615
205C1 NEM	2011	100 000	615
205C1 NEM	2012	100 000	615
205C1 NEM	2013	100 000	615
205C1 NEM	2014	100 000	615
205C1 NEM	2015	100 000	615
205C1 NEM	2016	100 000	615
205C1 NEM	2017	100 000	615
205C1 NEM	2018	100 000	615
205C1 NEM	2019	100 000	615
205C1 NEM	2020	100 000	615
205C1 NEM	2021	100 000	615
205C1 NEM	2022	100 000	615
205C1 NEM	2023	100 000	615
205C1 NEM	2024	100 000	615
205C1 NEM	2025	100 000	615
205C1 NEM	2026	100 000	615
205C1 NEM	2027	100 000	615
205C1 NEM	2028	100 000	615
205C1 NEM	2029	100 000	615
205C1 NEM	2030	100 000	615
205C1 NEM	2031	100 000	615
205C1 NEM	2032	100 000	615
205C1 NEM	2033	100 000	615
205C1 NEM	2034	100 000	615
205C1 NEM	2035	100 000	615
205C1 NEM	2036	100 000	615
205C1 NEM	2037	100 000	615
205C1 NEM	2038	100 000	615
205C1 NEM	2039	100 000	615
205C1 NEM	2040	100 000	615
205C1 NEM	2041	100 000	615
205C1 NEM	2042	100 000	615
205C1 NEM	2043	100 000	615
205C1 NEM	2044	100 000	615
205C1 NEM	2045	100 000	615
205C1 NEM	2046	100 000	615
205C1 NEM	2047	100 000	615
205C1 NEM	2048	100 000	615
205C1 NEM	2049	100 000	615
205C1 NEM	2050	100 000	615

205C1 ALLO	12.2	34.29	48	35	41	100.000	922
Victoria	192.2		123	32	37	310	106.0

205C ALLO	32.9	63.86	48 46 28	100.000	615	97.0
Carivena Island	212.9		123 10 10	602	136.7	-74.622
BC						-33.3

	201C ALLO	32.9	63.86	48.46 28	100.000	609	97.0	48.39	-33.23
				121	10	596	13.7		

Location	Year	Sample Size (n)	Mean (SD)	Median	Mode	Range	Skewness	Kurtosis	Significance
Saturna Island	1983	212	212.9	212.9	212.9	212.9	0.000	0.000	0.000
BC	1983	347	29.8	29.8	29.8	29.8	0.000	0.000	0.000
CD	1983	347	15.97	15.97	15.97	15.97	0.000	0.000	0.000
CD	1983	347	12.58	12.58	12.58	12.58	0.000	0.000	0.000
CD	1983	347	13.93	13.93	13.93	13.93	0.000	0.000	0.000

20/A NYA-1 WA 7.3 BP0198081ME 123 40 09 347  
Port Angeles Accepted on Channel 207B1 by Canada by letter received Jan 13, 2000 as a specially negotiated, short-spaced  
1.6 Pacific International Maritime Satellite Organization (INMARSAT) station in the direction of Canada.

allotment limited to 830 Watts ERP and 34 meters from the antenna

258A ALLO	7.88	48 21 28	6.000	0	33.0	22.000
258B ALLO	155.5	123 41 10	12	15.9		

258A R...	DEL	335.5	7.86	48 21 28	6.000	0	33.0	12.0R	-4.1M
		123.4		123 41 10	-12	15.9			

Sooke  
BC  
199.5  
Proposed by Canada 970825-Accepted by Commission 970919  
13 0 12.08 1.24

258A R---	23.0	13.19	48 34 09	6.000	0
BC	203.0		123 34 20	-42	15.9
Methosin Sec.					

[illegible]

[illegible]



CH CITY	CALL	TYPE STATE	AZL FILE #	DIST FILE #	LAT LNG.	Pwr(kW) HAAT(M)	COR(M) INT(M)	PRO(km) LICENSEE	*IN* *OUT*	Page # 7
										Overlap in km
221C	CUPQM	PRO DHV	12.3	52.38	48 45 13	87.000	0	33.4	-5.62<	16.20
Victoria		BC	192.3		123 29 25	-25	56.2			
217C	R---	ADD	12.2	34.29	48 35 41	100.000	655	97.0	21.57	-62.80*<
Victoria		BC	192.2		123 32 37	350	10.9			
217C	NEW	PRO DCN	12.2	34.29	48 35 41	3.500	655	47.8	28.99	-13.64*<
Victoria		BC	192.2		123 32 37	350	3.5			
217C	R---	DEL	12.2	34.29	48 35 41	100.000	655	97.0	21.57	-62.80*<
Victoria		BC	192.2		123 32 37	350	10.9			
217C	R---	DEL	32.9	63.86	48 46 28	100.000	655	97.0	47.86	-33.23*<
Saturna Island		BC	212.9		123 10 10	642	14.2			
217C	ALIO		32.9	63.86	48 46 28	100.000	655	97.0	47.86	-33.23*<
Saturna Island		BC	212.9		123 10 10	642	14.2			
---- Channel-six TV station of concern ----										
0622	CHEXTV	LI HN	32.9	63.87	48 46 28	100.000	0	59.0	To Grd S*	4.85
Victoria		BC	212.9		123 10 10	-13		CHek TV Ltd		


## **CERTIFICATE OF SERVICE**

I, Sherry L. Schunemann, do hereby certify that a copy of the foregoing "Comments on Notice of Proposed Rulemaking and Counterproposal" was mailed by First Class U.S. Mail, postage prepaid (or hand delivered as marked with an asterisk), this 30<sup>th</sup> day of September, 2004, to the following:

\*Ms. Rolanda F. Smith  
Federal Communications Commission  
Media Bureau  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Ms. Dana J. Puopolo  
2134 Oak Street, Unit C  
Santa Monica, California 90405

David Tillotson, Esq.  
Counsel, Jodesha Broadcasting, Inc.  
In re: MB Docket No. 04-305  
4606 Charleston Terrace NW  
Washington, D.C. 20007



Sherry L. Schunemann